UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED AIR LINES, INC.,	
Plaintiff,) Case No. 08-cv-3337
V.	Hon. James B. MoranMagistrate Judge Sidney I. Schenkier
THE CITY OF LOS ANGELES and	
LOS ANGELES WORLD AIRPORTS,)
)
Defendants.)
	_)

AGREED MOTION FOR LEAVE TO FILE REPLIES TO OBJECTIONS

Plaintiff United Air Lines, Inc. ("United") and The City of Los Angeles (the "City"), by and through its Department of Airports, also known as the Los Angeles World Airports ("LAWA") (the City and LAWA are collectively referred to herein as the "City"), respectfully request leave to file reply briefs, not to exceed 15 pages, in support of their respective objections to the Bankruptcy Court's Memorandum of Decision. In support of this motion, the parties states as follows:

- 1. This lawsuit stems from the Chapter 11 bankruptcy petition filed by United Airlines, Inc. ("UAL") and from an adversary proceeding UAL commenced against the City on or about December 30, 2005 (the "Adversary Proceeding").
- 2. On May 31, 2008, the Bankruptcy Court entered a Memorandum of Decision ("MoD") which, among other things, recommended that this Court issue a permanent injunction preventing the City from enforcing its prohibition on turboprop operations at Terminal 8.

- 3. On June 30, 2008, the parties both submitted objections to the MoD ("Objections"). Response briefs were submitted by the parties on August 15, 2008.
- 4. The parties believe that the submission of reply briefs in support of the parties' respective Objections will assist this Court in deciding whether to accept or reject the Bankruptcy Court's recommendations in the MoD.

WHEREFORE, the City respectfully requests that this Court enter an order granting the parties leave to submit reply briefs, not to exceed 15 pages, in support of their respective Objections no later than September 5, 2008.

Dated: August 22, 2008 Respectfully submitted,

KIRKLAND & ELLIS LLP,

KAYE SCHOLER LLC,

By: /s/ by Robert M. Spalding with permission of James C. Joslin

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